



January 15, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

I write on behalf of the Houston Symphony, located in Houston, Texas. Our organization inspires and engages a large, diverse audience of 300,000 people annually in Greater Houston and beyond through exceptional orchestral performances; our education programs also include performances for 82,000 students each year.

I am concerned today about protection for our wireless microphones and backstage communications devices. I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would potentially leave our organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's without the appropriate knowledge of their frequencies.

The use of wireless microphones is essential to producing high-quality performances, and professional wireless capability, with successful interference protection, is essential to the performing arts sector.

For our productions and concerts, we frequently use microphones, cue and control devices, and equipment controlling devices. In a typical performance setting, we use between 50 and 60 such

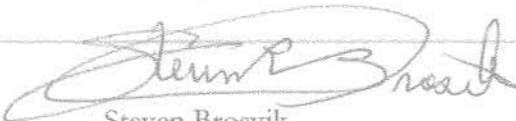
units, and we also often use wireless devices during our concerts. The bands and channels that we use are VHF and low UHF, and our microphones tune to 2,400 frequencies ranging from 470 MHz to 530 MHz. Most of the wireless devices are analog. We do own a lot of our equipment and rent additional pieces as needed. A reasonable normal life expectancy for our equipment is approximately 10 years of use. However, in order to be eligible for a Part 74 license, we would need to upgrade immediately to new and more expensive digital wireless devices.

In order to make the transition to new and more efficient devices, we would have to solicit for significant donations and grants, many from donors who would otherwise support our core operations. We would also need confirmation from the FCC that the new equipment would meet performance standards for an extended period of time, and we would also potentially require financial compensation for the expense of purchasing new equipment.

I appreciate that the Commission has sought public comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database under this plan, many professional performing arts organizations, including the Houston Symphony, will not. Further, I would also request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing our orchestra's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment and entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steven Brosvik", written over a horizontal line.

Steven Brosvik
General Manager/COO